

Appl. No. : 10/691,481  
Filed : October 22, 2003

### **REMARKS**

The foregoing amendments and the following remarks are responsive to the May 13, 2005 Office Action. Claims 1, 16, and 17 are amended, Claims 2-4 and 6-15 remain as originally filed, and Claim 5 is cancelled without prejudice. Thus, Claims 1-4 and 6-17 are presented for further consideration. Please enter the amendments and reconsider the claims in view of the following remarks.

#### **Response to Rejection of Claim 1 for Obviousness-Type Double Patenting**

In the May 13, 2005 Office Action, the Examiner rejects Claim 1 under the judicially-created doctrine of obviousness-type double patenting as being unpatentable over Claim 1 of U.S. Patent Application No. 10/690,983.

As described herein, Applicants have amended Claim 1 to include the limitations of Claim 5, and have cancelled Claim 5. Since the Examiner did not reject Claim 5 under obviousness-type double patenting, Applicants submit that amended Claim 1 of the present application is not obvious in view of Claim 1 of U.S. Patent Application No. 10/690,983. Applicants respectfully request that the Examiner withdraw the rejection of Claim 1 and pass Claim 1 to allowance.

#### **Response to Rejection of Claims 1-17 Under 35 U.S.C. § 103(a)**

In the May 13, 2005 Office Action, the Examiner rejects Claims 1-17 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,675,501 issued to Klingel ("Klingel") in view of U.S. Patent No. 6,693,255 issued to Freiwald et al. ("Freiwald").

##### **Claim 1**

As described herein, Applicants have amended Claim 1 to recite (emphasis added):

1. A laser manipulation system for controllably moving a laser head relative to a surface of an inhabitable structure and irradiating the surface with laser light from the laser head, the laser manipulation system comprising:
  - a positioning mechanism coupled to the laser head, the positioning mechanism comprising:
    - a first-axis position system adapted to move the laser head along a first direction substantially parallel to the surface; and
    - a second-axis position system coupled to the first-axis position system and adapted to move the laser head along a second direction substantially parallel to the surface; and
    - an anchoring mechanism coupled to the positioning mechanism and releasably coupled to the structure, wherein **the positioning mechanism is releasably coupled to the laser head, the second-axis**

Appl. No. : 10/691,481  
Filed : October 22, 2003

**position system is releasably coupled to the first-axis position system, and the anchoring mechanism is releasably coupled to the positioning mechanism,** whereby the laser manipulation system can be reversibly assembled and disassembled to facilitate transportation of the laser manipulation system to locations within the structure.

Applicants submit that amended Claim 1 includes limitations that are not disclosed or suggested by the combination of Klingel in view of Freiwald.

Klingel discloses a laser beam apparatus for processing workpieces, with the laser beam apparatus having a laser head which is movable along two axes, may be pivotable about an axis, and may also be movable along a third axis perpendicular to the first two axes (see, abstract and Figure 5 of Klingel). Nowhere does Klingel disclose or suggest that “the positioning mechanism is releasably coupled to the laser head,” “the second-axis position system is releasably coupled to the first-axis position system,” or “the anchoring mechanism is releasably coupled to the positioning mechanism,” as recited by amended Claim 1.

Freiwald discloses a laser ablation cleaning apparatus having a custom work head which is removably mountable upon the iron core stack of a conventional electric generator to clean the iron core stack by laser ablation (see, Freiwald at column 2, lines 11-15). While Freiwald discloses “a modular, mobile system that can be transported into the turbine-generator hall of a power plant” (Freiwald at column 9, lines 64-66), Freiwald does not disclose or suggest that “the positioning mechanism is releasably coupled to the laser head,” “the second-axis position system is releasably coupled to the first-axis position system,” or “the anchoring mechanism is releasably coupled to the positioning mechanism,” as recited by amended Claim 1.

Since amended Claim 1 includes limitations not disclosed or suggested by the combination of Klingel in view of Freiwald, Applicants submit that amended Claim 1 is patentably distinguished over Klingel in view of Freiwald. Applicants respectfully request that the Examiner withdraw the rejection of Claim 1 and pass Claim 1 to allowance.

Claims 2-4 and 6-15

Each of Claims 2-4, 6, 7, 10, 11, and 13-15 depends from amended Claim 1, each of Claims 8 and 9 depends from Claim 7, and Claim 12 depends from Claim 11. Therefore, each of Claims 2-4 and 6-15 includes all the limitations of amended Claim 1 as well as other limitations of particular utility. For at least the reasons stated above with respect to amended Claim 1, Applicants submit that Claims 2-4 and 6-16 are patentably distinguished over Klingel in view of

Appl. No. : 10/691,481  
Filed : October 22, 2003

Freiwald. Applicants respectfully request that the Examiner withdraw the rejection of Claims 1-4 and 6-15 and pass these claims to allowance.

Claim 16

As described herein, Applicants have amended Claim 16 to recite (emphasis added):

16. A laser manipulation system for controllably moving a laser head relative to a surface of an inhabitable structure and irradiating the surface with laser light from the laser head, the laser manipulation system comprising:

means for positioning the laser head by moving the laser head along a first direction substantially parallel to the surface and along a second direction substantially parallel to the surface and substantially perpendicular to the first direction, wherein **the positioning means is releasably coupled to the laser head**; and

means for releasably coupling the laser manipulation system to the structure, wherein **the coupling means is releasably coupled to the positioning means**, whereby the laser manipulation system can be reversibly assembled and disassembled to facilitate transportation of the laser manipulation system to locations within the structure.

Applicants submit that amended Claim 16 includes limitations that are not disclosed or suggested by the combination of Klingel in view of Freiwald. For example, Applicants submit that neither Klingel nor Freiwald disclose or suggest that the positioning means is "releasably coupled to the laser head," or that the coupling means is "releasably coupled to the positioning means." Therefore, Applicants submit that amended Claim 16 is patentably distinguished over Klingel in view of Freiwald. Applicants respectfully request that the Examiner withdraw the rejection of Claim 16, and pass Claim 16 to allowance.

Claim 17

As described herein, Applicants have amended Claim 17 to recite (emphasis added):

17. A method of controllably moving a laser head relative to a surface of an inhabitable structure and irradiating the surface with laser light from the laser head, the method comprising:

releasably coupling the laser head to a laser manipulation system, wherein the laser manipulation system comprises **a positioning mechanism releasably coupled to the laser head and an anchoring mechanism releasably coupled to the positioning mechanism**, whereby the laser manipulation system can be reversibly assembled and disassembled to facilitate transportation of the laser manipulation system to locations within the structure;

releasably coupling the anchoring mechanism of the laser manipulation system to the structure; and

**Appl. No.** : 10/691,481  
**Filed** : October 22, 2003

using the positioning mechanism to controllably move the laser head along a first direction substantially parallel to the surface and along a second direction substantially parallel to the surface and substantially perpendicular to the first direction.

Applicants submit that amended Claim 17 includes limitations that are not disclosed or suggested by the combination of Klingel in view of Freiwald. For example, Applicants submit that neither Klingel nor Freiwald disclose or suggest "a positioning mechanism releasably coupled to the laser head," or "an anchoring mechanism releasably coupled to the positioning mechanism," as recited by amended Claim 17. Therefore, Applicants submit that amended Claim 17 is patentably distinguished over Klingel in view of Freiwald. Applicants respectfully request that the Examiner withdraw the rejection of Claim 17 and pass Claim 17 to allowance.

**Summary**

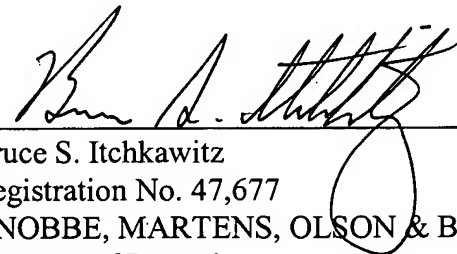
For the foregoing reasons, Applicants submit that Claims 1-4 and 6-17 are in condition for allowance, and Applicants respectfully request such action.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

Dated: 10/13/05

By: \_\_\_\_\_

  
Bruce S. Itchkawitz  
Registration No. 47,677  
KNOBBE, MARTENS, OLSON & BEAR, LLP  
Attorney of Record  
2040 Main Street  
Fourteenth Floor  
Irvine, CA 92614  
(949) 760-0404

1985790  
101305